



# State Water Resources Control Board



**Alan C. Lloyd, Ph.D.**  
*Agency Secretary*

## Executive Office

**Tam M. Doduc., Board Chair**  
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**Arnold Schwarzenegger**  
*Governor*

NOV - 3 2005

Mr. John Nesbit  
OPW Fueling Components, Inc.  
P.O Box 405003  
Cincinnati, OH 45240-5003

Dear Mr. Nesbit:

### OPW VAPORSAVER ORVR-COMPATIBLE PHASE II VAPOR RECOVERY SYSTEM

As you know, Assembly Bill 2955 (Statutes 2004, Chapter 649) added section 25290.1.2(a) to Chapter 6.7 of the Health and Safety Code (H&SC). This section requires the Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to certify, to the best of their knowledge and using existing resources, that equipment meeting the ARB's Enhanced Vapor Recovery (EVR) requirements also meets Underground Storage Tank statutory requirements.

On October 27, 2005, we received the enclosed signed statement by a California Registered Professional Engineer. OPW Fueling Components (OPW) is requesting minor modifications to the design of the Vaporsaver ORVR-Compatible Phase II Vapor Recovery System as certified under ARB Executive Order G-70-204. These minor modifications include the use of aluminum as a fan material in place of plastic, addition of a fan support bracket, and the use of cast aluminum for five components in place of machined aluminum housings.

Based on the information that OPW provided to us, we have found no evidence that the modifications of the OPW Vaporsaver ORVR-Compatible Phase II Vapor Recovery System conflict with H&SC Chapter 6.7. This determination assumes the OPW Vaporsaver ORVR-Compatible Phase II Vapor Recovery System is installed in accordance with applicable ARB Executive Orders and in accordance with manufacturer's instructions, as required by State Water Board regulations. Therefore, pursuant to H&SC, Chapter 6.7, section 25290.1.2(a) the State Water Board certifies that, to the best of its knowledge, the modifications of the OPW Vaporsaver ORVR-Compatible Phase II Vapor Recovery System meets the requirements of H&SC Chapter 6.7.

Mr. John Nesbit

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If you have questions regarding this letter, please contact Raed Mahdi at (916) 341-5871, or by email at [rmahdi@waterboards.ca.gov](mailto:rmahdi@waterboards.ca.gov).

Sincerely,

  
Celeste Cantu  
Executive Director

Enclosure: Certification Statements for the OPW Vaporsaver Phase II Vapor Recovery System

cc: Ms. Catherine Witherspoon  
Executive Officer  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Mr. Don Johnson  
Assistant Secretary  
Cal/EPA  
1001 I Street  
Sacramento, CA 95814

## Appendix

### Certification Statement for the OPW Vaporsaver ORVR-Compatible PHASE II Vapor Recovery System<sup>1</sup>

Based on a careful review and analysis, I hereby certify that the modifications to OPW Vaporsaver ORVR-Compatible PHASE II VR System (EO G-70-204), which is under consideration for California Air Resources Board (ARB) certification, meets the requirements of Chapter 6.7 of the California Health and Safety Code (the State Water Resources Control Board's underground storage tank requirements, including enhanced leak detection and continuous vacuum, pressure, or hydrostatic monitoring.)<sup>2</sup>

The OPW Vaporsaver ORVR-Compatible PHASE II VR System warranty is valid as long as the system is installed, operated, and maintained according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g., tank capacity, fueling points, throughputs, etc.) described below.

#### Limitations:

VaporVac/Vaporsensor installation shall not exceed a maximum of 16 fueling points.

James H. Ray 10/26/05  
Signed by Date  
(California Professional Engineer)

James H. Ray  
Printed Name

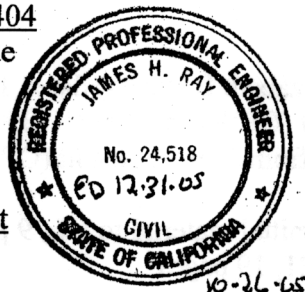
(Individual)  
Professional Engineer Company Name

2041 Hidden Valley Drive  
Mailing Address

Santa Rosa, CA 95404  
City, State, Zip Code

707 480-8115  
Phone Number

jhray@sbcglobal.net  
Email



John P. Nesbit 10/27/05  
Signed by Date  
(Company Representative)

John P. Nesbit  
Printed Name

OPW Fueling Components  
Equipment Manufacture Name

P.O.Box 405003  
Mailing Address

Cincinnati, OH 45240-5003  
City, State, Zip Code

513-870-3346  
Phone Number

inesbit@opw-fc.com  
Email

<sup>1</sup>This certification statement is part of the guidelines developed by the California Code of Air Resources Board (ARP) and State Water Resources Control Board (State Water Board) to implement provisions of Assembly Bill 2955 (Statutes 2004, Chapter 649:McCarthy).

<sup>2</sup>This certification is based on the presumption that the OPW Vaporsaver ORVR-Compatible PHASE II VR System is constructed, installed, maintained, and operated in accordance with all applicable requirements of Chapter 6.7 of California Health and Safety Code and Chapter 16 California Code of Regulations.